



Nia Holston <nia@alcenter.org>

Stip to Leave to Amend

Nia Holston <nia@alcenter.org>

Thu, Feb 27, 2025 at 10:34 AM

To: Emily Hoff <Emily.Hoff@phila.gov>, Jessica Gooding <jgooding@mceldrewpurtell.com>, John Coyle <jcoyle@mceldrewpurtell.com>, Katherine Raynor <kraynor@mceldrewpurtell.com>

Hi Emily,

Thank you for your email regarding Officer Thomas. We wanted to let you know that we plan to amend our complaint to 1) change the date listed in the complaint from February 22, 2021 to February 21, 2021, and 2) remove Deebu Cherian as a named defendant and add Jermaine Holmes, Charmaine Campbell, and Ryan Thomas. Please let us know if you will stipulate to this amendment. And in light of this, please let us know if you still want us to contact Mr. Holmes and Mr. Thomas.

Thank you,

Nia

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Nia Holston
Staff Attorney
Abolitionist Law Center
nia@alcenter.org

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Nia Holston <nia@alcenter.org>

Simmons - Deposition Notices

Emily Hoff <Emily.Hoff@phila.gov>

Wed, Feb 19, 2025 at 12:19 PM

To: Nia Holston <nia@alcenter.org>, Kathryn Faris <Kathryn.Faris@phila.gov>, John Coyle <jcoyle@mceldrewpurtell.com>, Jessica Gooding <jgooding@mceldrewpurtell.com>

Nia,

Thank you for sending these through. I'm in the process of confirming availability for those noticed and Sgt. Dick and will respond with a substantive confirmation once I am able.

Also, we are sending a letter to Mr. Holmes. I hope to have an update to you soon.

Best,

Emily

Emily M. Hoff (she/her)

Assistant City Solicitor

City of Philadelphia Law Department

1515 Arch Street, 14th floor

Philadelphia, PA 19102

O: (215) 683-5362

emily.hoff@phila.gov

www.phila.gov/law

From: Nia Holston <nia@alcenter.org>

Sent: Tuesday, February 11, 2025 4:55 PM

To: Kathryn Faris <Kathryn.Faris@Phila.gov>; Emily Hoff <Emily.Hoff@phila.gov>; John Coyle <jcoyle@mceldrewpurtell.com>; Jessica Gooding <jgooding@mceldrewpurtell.com>

Subject: Simmons - Deposition Notices

External Email Notice. This email comes from outside of City government. Do not click on links or open attachments unless you recognize the sender.

Counsel,

Please find deposition notices attached.

Best,

Nia Holston

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Nia Holston

Staff Attorney

Abolitionist Law Center

nia@alcenter.org

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